

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**HUGO IRAM CARDONA, JR.,**

**Defendant.**

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**CRIMINAL NO. EP-23-CR-01273-KC**

**BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY**

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas and the undersigned Assistant United States Attorney, and files the following Bill of Particulars for Forfeiture of Property.

The Indictment (ECF No. 13), returned on June 28, 2023, gave notice that the United States seeks the criminal forfeiture of property pursuant to Title 18 U.S.C. §§ 2253(a)(1), (2) and (3) & 981(a)(1)(C), as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c), from Defendant HUGO IRAM CARDONA, JR. Specifically, this Bill of Particulars seeks the criminal forfeiture of certain property, which is included herein from the Defendant, for the violations of Title 18 U.S.C. §§ 875(d) & 2252(a)(4)(B) and (b)(1) and as follows:

**NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE**

**[See Fed. R. Crim. P. 32.2.]**

**I.**

**Communicating a Threat in Interstate Commerce Violation and Forfeiture Statutes  
[Title 18 U.S.C. § 875(d), subject to forfeiture pursuant to Title 18 U.S.C. § 981(a)(1)(C),  
as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c)]**

As a result of the foregoing criminal violation set forth in Counts Six through Ten of the Indictment, the United States of America gives notice to the Defendant of its intent to seek the forfeiture of the property described below upon conviction pursuant to FED. R. CRIM. P. 32.2 and

Title 18 U.S.C. § 981(a)(1)(C), as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c). Title 18 U.S.C. § 981(a)(1)(C) states in pertinent part:

**Title 18 U.S.C. § 981. Civil Forfeiture**

(a)(1) The following property is subject to forfeiture to the United States:

\* \* \*

(C) Any property, real or personal, which constitutes or is derived from proceeds traceable to a violation . . . of this title or any offense constituting “specified unlawful activity” (as defined in section 1956(c)(7) of this title), or a conspiracy to commit such offense.

**II.**

**Possession of Child Pornography Violation and Forfeiture Statutes**

**[Title 18 U.S.C. §§ 2252(a)(4)(B) and (b)(1), subject to criminal forfeiture pursuant to Title 18 U.S.C. §§ 2253(a)(1), (2) and (3)]**

As a result of the criminal violations set forth in Count Eleven of the Indictment, the United States of America gives notice of its intent to seek the forfeiture of the property described below from the Defendant including but not limited to computer(s), electronic equipment, accessories, and devices, upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. §§ 2253(a)(1), (2), and (3), which state:

**Title 18 U.S.C. § 2253. Criminal forfeiture**

**(a) Property subject to criminal forfeiture.** -A person who is convicted of an offense under this chapter involving a visual depiction described in section 2251, 2251A, 2252, 2252A, or 2260 of this chapter or who is convicted of an offense under section 2251B of this chapter, or who is convicted of an offense under chapter 109A, shall forfeit to the United States such person’s interest in-

(1) any visual depiction described in section 2251, 2251A, 2252, 2252A, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

This Notice of Demand for Forfeiture includes but is not limited to the property described below in Paragraph III.

**III.**  
**Property**

1. Apple iPhone 8 Plus, S/N: F2LV6EHMJCM0, IMEI: 356714080691682;
2. UMX cell phone Model: UMX U693CL, S/N: 693CL71220020777, IMEI: 310240150664032;
3. Samsung Galaxy X, S/N: R58R9214ZTP, IMEI: 352744117738093;
4. Apple iPhone 12 Pro, S/N: G6TFQA1L0D82, IMEI: 356462525725224;
5. Apple iPhone 6, S/N FFMR4A0LGMC, IMEI: 352014071801257;
6. Apple iPhone 6, S/N DNXPQ98XG5MD, IMEI: 359296068867721;
7. Apple Watch, blue-colored band;
8. Apple iPhone 6, S/N: FFNPRQ2KG5MC, IMEI: 359302069090568; and
9. Any and all other property and/or accessories involved in or used in the commission of the criminal offense.

Respectfully submitted,

JAIME ESPARZA  
UNITED STATES ATTORNEY

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 3, 2023, a true and correct copy of the foregoing instrument was electronically filed with the Clerk of the Court using the CM/ECF System, which will send notice to the following CM/ECF participants:

**Sandra S. Lewis**

Federal Public Defender

700 E. San Antonio St.

Room D-401

El Paso, TX 79901

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*Attorney for Defendant HUGO IRAM CARDONA, JR.*

/s/

Patricia J. Acosta

Assistant United States Attorney